

PRIVACY POLICY

We respect your privacy and appreciate the importance of your trust. As part of our efforts to help you understand how we handle the personal information you share with us, and in compliance with the European General Data Protection Regulation (“GDPR”), please review the following terms carefully.

1. General Terms.

As more fully described below, we may collect and process certain information that is provided by you to us. We have a legal basis for collecting and processing such information because:

- You have given us permission to do so;
- We must provide services to you in conjunction with a request or order that you have placed on our website; and/or
- We are required to do so in order to comply with applicable law.

The Section below describes the types of information that we may collect from you and our business purposes for collecting such information.

2. Information that We Collect and Process.

Information Provided by You:

We may collect Personal Information that you provide to us. “Personal Information” is information that can be used to identify you individually, and includes items such as your name, home address, e-mail address, telephone number, demographic information, and/or payment information, such as your account or card number, if used to make a purchase from our Website. The type of Personal Information that we may collect depends on your use of this Website and what information you provide to us.

Analytical Information:

We and our third-party service providers may also use a variety of technologies that automatically or passively collect information about how this Website is accessed and used (known as "Usage Information"). “Usage Information” may include the type of browser and device you used to access our Website, your operating system and application version, the web pages accessed by you, the time you accessed these web pages, preceding web page views, and your use of any features or applications on this Website. Statistical data like this helps us understand what is interesting and relevant to our customers, so we can best adapt our content for our customers’ benefit.

We and our third-party service providers may also automatically collect an IP address or other unique identifier information from the computer, mobile device, technology or other device you use to access this Website. We may use this information to, amongst other things, administer this Website, help diagnose server problems, analyze trends, track web

page movements, help identify you and your shopping cart, and gather broad demographic information for collected use.

Cookies and Other Technology:

Like many sites, our Website employs cookies, JavaScript tags and Web beacons (also known as clear GIF technology or "action tags") to speed your navigation of our Website, recognize you and your access privileges, and track usage of our Website. Cookies are small pieces of information that are stored as text files by your Internet browser on your computer's hard drive. We use both persistent cookies and third-party cookies. Persistent and third-party cookies enable us to track and target the interests of our customers to enhance your experience on our Website. Persistent cookies are used to make it easier for you to navigate our Website, and remain on your hard drive for an extended period of time. Third party cookies are only used for short-term tracking.

Most Internet browsers are initially set up to accept cookies. You may download an opt-out cookie to disable any and all cookies we employ to track and enhance your user experience— however, your ability to use the website will be then limited and/or unavailable. As different computers and different Internet browsers all require their own version of the opt-out cookie, you must perform this opt-out process on all computers and browsers that you wish to be opted-out.

3. Our Use and Sharing of Your Information.

We use the information that we collect about you for a variety reasons, including the following:

- Verifying your identity;
- Fulfilling your product orders;
- Responding to your questions;
- Communicating with you about your purchases and activities on this Website;
- Improving the Website and our customers' experience;
- Sending you emails and other marketing communications; and
- Sending notices or information.

We may share your Personal Information as described below:

- With our vendors, consultants, agents, contractors, and other service providers or sub-processors that we use to support our business;
- To provide you with any information or services that you request;
- To respond to subpoenas, court orders, and other legal process, or as otherwise required by law;
- To exercise our legal rights or to defend ourselves against legal claims, to enforce our contracts, to investigate, respond to and resolve problems or inquiries (including governmental inquiries), or to permit us to pursue available remedies or limit the damages that we may sustain;

- In connection with an actual or potential merger, sale, acquisition, assignment, or transfer of all or part of our assets, affiliates, lines of business, or products and services, including at bankruptcy;
- With our affiliates, subsidiaries, or parent companies; and
- With your consent.

If you would like to subscribe to the current list of our sub-processors with whom we share Personal Information, please send an email to info@rutlen.com.

We may also use and disclose any information that is aggregated or de-identified so that it does not identify you personally, in our discretion.

4. Security and Your Information.

We, and our sub-processors, use reasonable safeguards to protect Personal Information against loss, unauthorized use, disclosure or destruction and when transferring information for processing. However, please note that no electronic data transmission or storage of information can be absolutely secure. We cannot ensure or warrant the security of any information to you transmit to us.

5. How Long We Will Retain Your Information.

We will not retain your personal information for longer than required. We will keep your personal information until we no longer have a valid legal or business reason for keeping it or you request us to stop using it. Please note that we may keep just enough of your personal information to ensure that we comply with your request not to use your personal information or comply with your right to erasure. For example, we must keep your request to be erased even if it includes your personal data until such time as you are no longer our customer.

6. Consent to Processing Information.

This Website is governed by and operated in accordance with the laws of the State of California and the United States, and is intended for the enjoyment of residents of the United States. If you are located outside of the United States, please be aware that information we collect will be transferred to and processed in the United States.

7. Third Party Links and Services.

Our Website may contain links to third-party websites and products and services. We do not control such linked websites and this Privacy Policy does not apply to those websites. We encourage you to read the privacy policy of any third-party website that you visit before you provide any information to that website's owner.

8. Our Children's Policy.

This Website is not directed to children under the age of thirteen (13). Children may not use our Website or purchase our products, and we do not knowingly collect any personal information from children under the age of thirteen (13). We have no way of distinguishing

the age of individuals who access our Website. If a child has provided us with personal information, the parent or guardian should contact us to remove the information and opt out of promotional opportunities using the contact link provided below.

9. Changes and Updates to our Privacy Policy.

We may change this Privacy Policy at any time without prior notice to you. Any changes that we make will be effective immediately upon our posting of the revised Privacy Policy on this Website. Your continued use of this Website constitutes your consent to any changes made. We will use your Personal Information in a manner consistent with the Privacy Policy in effect at the time you submitted your Personal Information, unless you later consent to a revised policy. We encourage you to periodically review this page for the latest information on our privacy practices.

10. Questions or Requests?

In the event that you wish to submit a question regarding our use of your personal information or request to modify, erase, or restrict the processing of your personal information, please contact us at info@rutlen.com.